

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

DON BREAZEALE & ASSOCIATES,
INC., DONALD L. and IRENA B.
BREAZEALE,

Defendants.

NO. 2:11-cv-00050

ANSWER OF DEFENDANTS

COMES NOW, Defendants, DON BREAZEALE & ASSOCIATES, INC., DONALD
L. and IRENA B. BREAZEALE and answer Plaintiff's complaint as follows:

1. Deny allegations of paragraph 1.
2. Admit allegations of paragraphs 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, and 12.
3. For lack of precise agreement, Defendants deny paragraphs 13, 14, 15, 16, and 17.
4. Deny in part, paragraphs 20 and 21.
5. Deny paragraphs 22 and 23.

AFFIRMATIVE DEFENSE

On or about December 2010, Plaintiff and Defendants ARRIVED AT AN ACCORD
AND SATISFACTION OF THE Plaintiff's claim, in consideration of a sum of money,

ANSWER OF DEFENDANTS- 1

LAW OFFICES
SHULKIN HUTTON INC., P.S.
7900 SE 28TH STREET, SUITE 302
MERCER ISLAND, WASHINGTON 98040
TELEPHONE (206) 623-3513
TELECOPIER (206) 682-9289

1 conditioned on performance, and accepted by Plaintiff, and upon payment as required, in
2 full satisfaction of the claims alleged in the complaint.

3 WHEREFORE, Defendants demand that judgment be entered as follows:

4 Dismissing Plaintiff's complaint with prejudice and without an award of costs and
5 awarding Defendant statutory costs and attorney fees incurred in this action and such further
6 relief as the court finds just and proper.
7

8 DATED this 25th day of February, 2011.
9

10 Respectfully submitted,
11 DON BREAZEAL & ASSOCIATES, INC.,
12 DONALD L. and IRENA B. BREAZEAL by
13 their attorneys SHULKIN HUTTON INC., P.S.

14 By  _____

15 Jerome Shulkin WSBA #2198
16 Attorney for Defendants.
17
18
19
20
21
22
23
24
25
26

ANSWER OF DEFENDANTS- 2

LAW OFFICES
SHULKIN HUTTON INC., P.S.
7900 SE 28TH STREET, SUITE 302
MERCER ISLAND, WASHINGTON 98040
TELEPHONE (206) 623-3515
TELECOPIER (206) 682-9289